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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON, EUGENE DIVISION**

NICOLE GILILLAND, an individual,

Plaintiff,

vs.

SOUTHWESTERN OREGON COMMUNITY
COLLEGE DISTRICT by and through its
BOARD OF EDUCATION, an Oregon commu-
nity college District and Board; SOUTHWEST-
ERN OREGON COMMUNITY COLLEGE, an
Oregon community college; PATTY SCOTT, an
individual; TIM DAILY, an individual; FRAN-
CISCO SALDIVAR, an individual; SUSAN
WALKER, an individual; MELISSA SPERRY,
an individual and PAMELA WICK, an individu-
al,

Defendants.

Case No. 6:19-cv-00283-MK

**DECLARATION OF BRANDON
MARK IN SUPPORT OF MOTION
FOR SPOILIATION SANCTIONS**

I, Brandon Mark, declare as follows:

1. I have personal knowledge of the facts set forth below, and I am over the age of eighteen.

2. I am counsel of record to Plaintiff in this matter.

3. Attached hereto as Exhibit 204 is a copy of an August 9, 2018, letter from Defendant SWOCC's insurance carrier to Nicole Gililland's then attorney acknowledging Ms. Gililland's earlier demand letter.

4. Attached hereto as Exhibit 205 is a copy of a September 19, 2018, email from Ms. Gililland's prior attorney to SWOCC's insurance carrier discussing the history of communications by Ms. Gililland's attorneys to SWOCC about these issues.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of July 2021.

/s/ Brandon J. Mark
Brandon J. Mark

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of July 2021, I caused to be filed a true and correct copy of the foregoing **DECLARATION OF BRANDON MARK IN SUPPORT OF MOTION FOR SPOILIATION SANCTIONS** with the Court's ECF system, which sent notice of such filing to counsel for all parties hereto.

DATED: July 19, 2021.

/s/ Brandon J. Mark